

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

POSTPROCESS TECHNOLOGIES, INC.

Plaintiff,

vs.

AUDUBON MACHINERY
CORPORATION, JOSEPH M.
MCMAHON, and SCOTT GILMOUR,

Defendants.

Civil Action No. 1:19-cv-00334

Hon. Lawrence J. Vilaro

**STIPULATION AND JOINT
MOTION TO EXTEND
PLAINTIFF'S TIME TO
ANSWER**

Plaintiff Postprocess Technologies, Inc. and defendants Audubon Machinery Corporation, Joseph McMahon and Scott Gilmour hereby stipulate and respectfully move the Court for an Order extending the time for Plaintiff to answer or otherwise move with respect to the counterclaims for 14 days, up to and including June 7, 2019. The grounds for this joint motion are as follows:

(1) Plaintiff contends that this matter involves complex legal and factual issues relating to claims of, among other things, nonliability for patent infringement, breach of contract, fraud, and trade secret misappropriation, which require significant pre-answer investigation and analysis; and

(2) No party will be prejudiced if the Court issues an Order granting the relief sought.

For these reasons, the parties believe they have demonstrated good cause for extending Plaintiff's time to answer and request that the Court enter an Order extending the time for Plaintiff to answer or otherwise move with respect to the counterclaims through June 7, 2019.

Dated: May 17, 2019

FLACHSBART & GREENSPOON, LLC

/s/ Robert P. Greenspoon

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